# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,

Plaintiff,

Case No. 1:18-cv-250-SPB

v.

Hon. Susan Paradise Baxter

ADECCO USA, INC.,

Defendant.

## JOINT MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff U.S. Equal Employment Opportunity Commission ("EEOC") and Defendant Adecco USA, Inc. ("Defendant"), respectfully move the Court for approval and entry of the attached Consent Decree (Exhibit 1). In support of the Motion, the parties state as follows:

- 1. EEOC and Defendant have negotiated the attached Consent Decree as a resolution of EEOC's claims in the above-captioned case.
- 2. EEOC and Defendant believe that the terms of this Consent Decree are adequate, fair, reasonable, equitable, and just.
- 3. EEOC and Defendant believe that the Consent Decree conforms with the Federal Rules of Civil Procedure and is not in derogation of the rights or privileges of any person. The entry of this Consent Decree will further the objectives of the Americans with Disabilities Act of 1990, as amended, and will be in the best interests of the parties, those for whom EEOC seeks relief, and the public.

## Respectfully submitted,

# U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

/s/ Gregory A. Murray

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Counsel for Defendant Adecco USA, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2019, I electronically filed the foregoing Joint Motion for Entry of Consent Decree with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Gregory A. Murray

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